

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:** § **CHAPTER 11**  
**FIELDWOOD ENERGY LLC. et al.,** § **CASE No. 20-33948 (MI)**  
**Debtors.** § **(Jointly Administered)**

**PLAINS GAS SOLUTIONS, LLC'S LIMITED OBJECTION TO DEBTORS'  
PROPOSED ASSUMPTION OF CONTRACTS ABSENT PAYMENT OF THE  
CORRECT CURE AMOUNT**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Plains Gas Solutions, LLC (referred to herein as “PGS”) files this limited objection to Debtors’ notice of assumption of executory contracts, as set forth in the Schedule of Assumed Contracts filed May 27, 2021 (Docket Entry 1395), as subsequently amended on June 2, 2021 (Docket Entry 1456) (the “Notice”) and in support of its objection, PGS states as follows:

1. PGS and Debtor Fieldwood Energy (“Debtor”) are parties to two service agreements dated April 1, 2018, and October 1, 2008, respectively (the “Agreements”).
2. Debtor has defaulted under the Agreements by short paying three invoices for a total past due amount of \$75,577.21
3. The Notice provides that Debtor intends to assume the Agreements, but incorrectly lists the cure amount at \$0. The current cure amount must be paid prior to Debtor assuming the Agreements.

WHEREFORE, PREMISES CONSIDERED, Plains Gas Solutions, LLC respectfully requests that Debtors be required to cure the defaults under the Agreements described above by making payment to PGS in the amount of \$75,577.21 and for such other and further relief as may be just under the premises.

Respectfully submitted,

/s/Patricia Williams Prewitt  
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Counsel for Plains Gas Solutions, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Objection was served by electronic mail on the 8th day of June 2021.